

ZELLE HOFMANN VOELBEL MASON &
GETTE, LLP
FRANCIS O. SCARPULLA, SBN 41059
44 Montgomery Street, Suite 3400
San Francisco, CA 94104
Telephone: (415) 693-0700
Indirect-Purchaser Plaintiffs' Liaison Counsel

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
One Montgomery Street, Suite 3100
San Francisco, California 94104
Telephone: (415) 393-8200
Facsimile: (415) 986-5309

ARNOLD & PORTER LLP
RONALD C. REDCAY, SBN 67236
777 South Figueroa Street, 44th Floor
Los Angeles, California 90017-2513
Telephone: (213) 243-4002
Facsimile: (213) 243-4199

Attorneys for Defendants
MICRON TECHNOLOGY, INC. and
MICRON SEMICONDUCTOR PRODUCTS, INC.

[Names and addresses of other parties and their
counsel appear at end]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re DYNAMIC RANDOM ACCESS
MEMORY (DRAM) ANTITRUST
LITIGATION

No. M-02-1486-PJH

MDL No. 1486

This Document Relates To:
ALL INDIRECT PURCHASER ACTIONS

**STIPULATION AND ~~[PROPOSED]~~
ORDER MODIFYING NOVEMBER 3,
2005 AND MAY 15, 2006 SCHEDULING
ORDERS FOR ALL UNSTAYED
INDIRECT PURCHASER ACTIONS**

Date: None
Time: N/A
Judge: The Hon. Phyllis J. Hamilton

STIPULATION

Indirect Purchaser Plaintiffs and Defendants (collectively, the “parties”), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS, the parties have been negotiating extensions to Defendants’ responses to outstanding discovery and the parties’ deadlines for class certification briefing;

WHEREAS, on May 5, 2006, the parties submitted a Stipulation and Proposed Order to the Court;

WHEREAS, in that Stipulation, Plaintiffs agreed to Defendants’ request that they be given an additional thirty (30) days to respond to the Indirect Purchaser Plaintiffs’ First Set of Interrogatories to All Defendants and First Set of Requests for Production of Documents to All Defendants, such that the responses would be due on May 31, 2006;

WHEREAS, in that Stipulation, the parties described a request by the Indirect Purchaser Plaintiffs that the schedule for filing and briefing their class certification motion, as set forth in the Indirect Purchaser Pretrial Scheduling Order (entered on November 3, 2005), be extended for 90 days;

WHEREAS, in that Stipulation, the Defendants agreed to a 30-day extension of that schedule as it pertains to the class certification motion so that the parties can attempt to negotiate a complete pretrial schedule (including rescheduling the class motion deadlines), without prejudice to the Indirect Purchaser Plaintiffs’ ability to seek further modification of the Pretrial Scheduling Order;

WHEREAS, that Stipulation and Proposed Order was accepted and signed by the Court on May 16, 2006;

WHEREAS, the Defendants requested that they be given an additional nine (9) days to respond to the Indirect Purchaser Plaintiffs’ First Set of Interrogatories to All Defendants and First Set of Requests for Production of Documents to All Defendants, such that the responses would be due on June 9, 2006; and

WHEREAS, the parties engaged in good faith negotiations to resolve all outstanding scheduling issues and have resolved scheduling issues related to discovery and class certification;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

(i) Defendants' responses to the Indirect Purchaser Plaintiffs' First Set of Interrogatories to All Defendants and the First Set of Requests for Production of Documents to All Defendants are due on June 9, 2006.

(ii) The PROPOSED NEW SCHEDULE FOR INDIRECT PURCHASER CASES, as set forth in the Indirect Purchaser Pretrial Scheduling Orders, shall be revised as follows:

August 14, 2006	Last day for indirect purchaser plaintiffs to file (a) class certification expert reports; and (b) motion for class certification.
September 25, 2006	Last day for defendants to file (a) class certification expert reports; and (b) opposition to indirect purchasers' class certification motion.
October 18, 2006	Last day for indirect purchaser plaintiffs to file (a) class certification reply expert reports and (b) class certification reply brief.
November 1, 2006	Class certification argument (subject to Court's calendar).

DATE: June 12, 2006

INDIRECT PURCHASER PLAINTIFFS:

By:


Francis O. Scarpulla

Francis O. Scarpulla
ZELLE HOFMANN VOELBEL MASON &
GETTE, LLP
44 Montgomery Street, Suite 3400
San Francisco, CA 94104
Telephone: (415) 693-0700

David Boies
STRAUS & BOIES, LLP
10513 Braddock Road
Fairfax, VA 22032
Facsimile: (703) 764-8704
Indirect-Purchaser Plaintiffs' Co-Lead Counsel

**Indirect-Purchaser Plaintiffs' Liaison Counsel
signing on behalf of all Indirect-Purchaser
Plaintiffs for purposes of this stipulation**

1 Josef Cooper
2 COOPER & KIRKHAM, P.C.
3 655 Montgomery Street, 17th Floor
4 San Francisco, CA 94111
5 Facsimile: (415) 882-7040

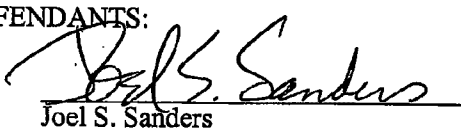
6 **Indirect-Purchaser Plaintiffs' Co-Lead
7 Counsel**

8 Daniel E. Gustafson
9 GUSTAFSON GLUEK PLLC
10 650 Northstar East
11 608 Second Avenue South
12 Minneapolis, MN 55402
13 Facsimile: (612) 339-6622

14 **Indirect-Purchaser Plaintiffs' Co-Lead
15 Counsel**

16 DEFENDANTS:

17 By:

18 
19 Joel S. Sanders

20 Joel S. Sanders
21 GIBSON, DUNN & CRUTCHER LLP
22 One Montgomery Street
23 Montgomery Tower, 31st Floor
24 San Francisco, CA 94104
25 (415) 393-8200 (telephone)
26 (415) 986-5309 (facsimile)

27 Ronald C. Redcay
28 ARNOLD & PORTER LLP
777 South Figueroa Street, 44th Floor
Los Angeles, California 90017-2513
(213) 243-4002 (telephone)
(213) 243-4199 (facsimile)

**Attorneys for Defendants Micron Technology,
Inc. and Micron Semiconductor Products, Inc.
and signing on behalf of all defendants for
purposes of this stipulation**

Daniel J. Mogin
THE MOGIN LAW FIRM
110 Juniper Street
San Diego, CA 92101
Facsimile: (619) 687-6610

**Indirect-Purchaser Plaintiffs' Co-Lead
Counsel**

Aton Arbisser
Julian Brew
Tanja Shipman
KAYE SCHOLER LLP
1999 Avenue of the Stars, Suite 1700
Los Angeles, CA 90067
Facsimile: (310) 788-1200

**Attorneys for Defendants Infineon
Technologies North America Corp. and
Infineon Technologies AG**

1 Gary L. Halling
2 James L. McGinnis
3 David D. Sohn
4 SHEPPARD, MULLIN, RICHTER
5 & HAMPTON LLP
6 Four Embarcadero Center, 17th Floor
7 San Francisco, CA 94111
8 Facsimile: (415) 434-3947

9 David A. Donohoe
10 Daniel F. McInnis
11 AKIN GUMP STRAUSS HAUER & FELD LLP
12 1333 New Hampshire Avenue, N.W.
13 Washington, D.C. 20036-1564
14 Facsimile: (202) 887-4288

15 Stephen A. Mansfield
16 AKIN GUMP STRAUSS HAUER & FELD LLP
17 580 California Street, Suite 1500
18 San Francisco, CA 94104-1036
19 Facsimile: (415) 765-9501

20 **Attorneys for Defendants Samsung**
21 **Electronics Co., Ltd, and Samsung**
22 **Semiconductor, Inc.**

William M. Goodman
Andrea DeShazo
Raphael Goldman
TOPEL & GOODMAN
832 Sansome Street, 4th Floor
San Francisco, CA 94111
Facsimile: (415) 398-5030

Attorneys for Defendants Mosel Vitelic
Corporation and Mosel Vitelic Incorporated

1 Terrence A. Callan
 2 Albert J. Boro, Jr.
 PILLSBURY WINTHROP SHAW
 3 PITTMAN LLP
 50 Fremont Street
 4 Post Office Box 7880
 San Francisco, CA 94120-7880
 5 Facsimile: (415) 983-1200

6 Kenneth R. O'Rourke
 Steven Bergman
 7 Daniel L. Alexander
 O'MELVENY & MYERS LLP
 8 400 S. Hope Street
 Los Angeles, CA 90071-2899
 9 Facsimile: (213) 430-6407

10 Michael Tubach
 O'MELVENY & MYERS LLP
 11 Embarcadero Center West
 275 Battery Street
 12 San Francisco, CA 94111
 Facsimile: (415) 984-8701

13
 14 Ian Simmons
 O'MELVENY & MYERS LLP
 15 1625 Eye Street, NW
 Washington, DC 20006
 16 Facsimile: (202) 383-5414

17 **Attorneys for Defendants Hynix**
Semiconductor, Inc., and Hynix
 18 **Semiconductor America, Inc.**

19
 20 James G. Kreissman
 Harrison J. Frahn IV
 21 Jason M. Bussey
 SIMPSON THACHER & BARTLETT LLP
 22 2550 Hanover Street
 Palo Alto, CA 94304
 23 Facsimile: (650) 251-5002

24 **Attorneys for Defendants Elpida Memory**
(USA), Inc. and Elpida Memory, Inc.

Howard M. Ullman
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 The Orrick Building
 405 Howard Street
 San Francisco, CA 94105-2669
 Facsimile: (415) 773-5759

Robert Freitas
 ORRICK HERRINGTON & SUTCLIFFE LLP
 1000 Marsh Road
 Menlo Park, CA 94025-1021
 Facsimile: (650) 614-7401

Attorneys for Defendants Nanya Technology
Corporation and Nanya Technology
Corporation USA

Robert B. Pringle
 Paul Griffin
 Jonathan E. Swartz
 THELEN REID & PRIEST LLP
 101 Second Street, Suite 1800
 San Francisco, CA 94105
 Facsimile: (415) 371-1211

Attorneys for Defendant NEC Electronics
America, Inc.

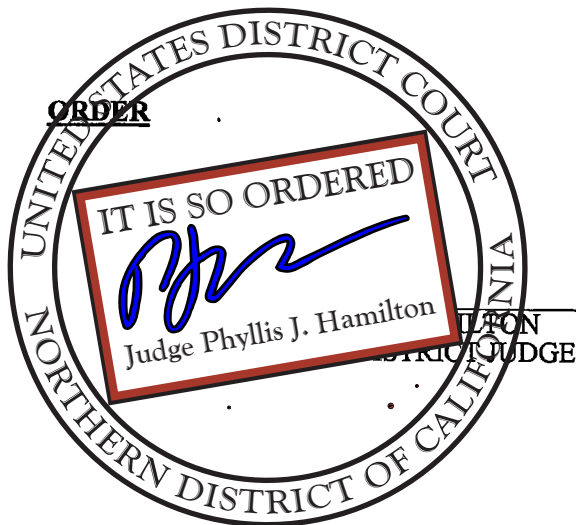
1 William S. Farmer, Jr.
2 COLLETTE ERICKSON FARMER
& O'NEILL LLP
3 235 Pine Street, Suite 1300
San Francisco, CA 94104
4 Facsimile: (415) 788-6929

5 Steven H. Morrisett
6 FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP
Stanford Research Park
7 3300 Hillview Avenue
Palo Alto, CA 94304-1203
8 Facsimile: (650) 849-6666

9 Attorneys for Defendants Winbond
10 Electronics Corporation,
Winbond Electronics Corporation America

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12
13
14 SO ORDERED.

15 DATED: 8/4/06
16 _____



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CERTIFICATE OF SERVICE

**IN RE DYNAMIC RANDOM ACCESS MEMORY (DRAM)
ANTITRUST LITIGATION SERVICE LIST**

Case No. M-02-1486 PJH

MDL No. 1486

I, Monica J. Steele, certify and declare under penalty of perjury that I: am a citizen of the United States; am over the age of 18 years; am employed by Zelle, Hofmann, Voelbel, Mason & Gette LLP, 44 Montgomery Street, Suite 3400, San Francisco, CA 94104, whose members are members of the State Bar of California and at least one of whose members is a member of the Bar of each Federal District Court within California; am not a party to or interested in the cause entitled upon the document to which this Certificate of Service accompanies; and that on June 12, 2006, I served a true and correct copy of the following document(s) in the manner indicated below:

**1. STIPULATION AND [PROPOSED] ORDER MODIFYING NOVEMBER 3, 2005
AND MAY 15, 2006 SCHEDULING ORDERS FOR ALL UNSTAYED INDIRECT
PURCHASER ACTIONS**

☒ **By USDC Live System-Documents Filing System:** on all interested parties registered for e-filing.

Dated: June 12, 2006

Signed /s/ Monica J. Steele
Monica J. Steele
Secretary

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